

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

In re

Case Number 23-10469
Chapter 13

SHANEIKA R. HOLT

Debtor(s).

Plaintiff

SHANEIKA R. HOLT

v.

Adv. Proc. No. 23-05030

Defendant

HARPETH FINANCIAL SERVICES, LLC

MOTION FOR DEFAULT JUDGMENT

COMES NOW the Debtor by and through her undersigned counsel of record, and would hereby submit this Affidavit for Default Judgment in accordance with F.R. CIV. P. No. 55 and Bankruptcy Rule No. 7055 and for cause would show;

1. The instant Adversary Proceeding was filed on May 25, 2023.
2. The summons on this cause was issued on May 26, 2023 which set a deadline for serving an Answer or Motion within thirty(30) days.

3. Service on the Defendant was made in this matter pursuant to Bankruptcy Rule 7004(b)(1) by mailing the Summons and Complaint by first class mail, postage pre-paid to Defendant, Harpeth Financial Services, LLC, 100 Oceanside Drive, Nashville, TN 37204-2351, Registered Agents Inc as Registered Agent for Harpeth Financial Services, LLC, 116 Agnes Road, Suite 200, Knoxville, TN 37919, The Hill Firm PLLC, P.O. Box 150529, Nashville, TN 37215, Rob Hill as Registered Agent for The Hill Firm PLLC, 109 Kenner Ave, Suite L-101 Nashville, TN 37205-2246 on May 30, 2023.

4. The date of the filing of the Affidavit of Service in this matter was May 30, 2023.
5. No Answer or Motion has been received or filed and no appearance has been made by any party representing the defendant or the defendant proceeding pro-se.
6. To the best of the Plaintiffs knowledge, the Defendant is not in the military service.
7. To the best of the Plaintiffs knowledge, information and belief, the Defendants are not infants or incompetent.

Wherefore the Plaintiff Prays this Honorable Court set a hearing on this cause at which time the Plaintiff be awarded a default judgment against Defendant, Harpeth Financial Services, LLC and for such other further and general relief as the Plaintiff may be entitled.

Respectfully Submitted,
ROBERT B. VANDIVER, JR.
/s/ Robert B. Vandiver, Jr.
By: Robert B. Vandiver, Jr. #15685
Attorney for Debtor
P.O. Box 906
Jackson, TN 38302

CERTIFICATE OF SERVICE

I Robert B. Vandiver, Jr. do hereby certify that I have mailed a copy of the foregoing Pleading to the Defendant Harpeth Financial Services, LLC, 100 Oceanside Drive, Nashville, TN 37204-2351, Registered Agents Inc as Registered Agent for Harpeth Financial Services, LLC, 116 Agnes Road, Suite 200, Knoxville, TN 37919, The Hill Firm PLLC, P.O. Box 150529, Nashville, TN 37215, Rob Hill as Registered Agent for The Hill Firm PLLC, 109 Kenner Ave, Suite L-101, Nashville, TN 37205-2246

This the 24th day of July, 2023.

/s/ Robert B. Vandiver, Jr
Robert B. Vandiver, Jr. #15685
P.O. Box 906
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(731)-554-1313